

START

Meeting Minutes Transmittal

325 HAZARDOUS WASTE TREATMENT UNITS
Unit Managers Meeting
337 Building, Mt. Rainier
Richland, Washington

April 13, 1995
2:00 p.m. to 4:00 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

_____ Date: _____
Clifford E. Clark, Unit Manager, RL

Not Present _____ Date: _____
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Jeanne J. Wallace _____ Date: 5/31/95
Jeanne J. Wallace, Unit Manager, Washington State Department of Ecology

325 Hazardous Waste Treatment Unit, PNL Concurrence

Kathleen A. Poston _____ Date: 5/31/95
Kathleen A. Poston, Contractor Representative, PNL

Purpose: Discuss Permitting Process

- Meeting Minutes are attached. The minutes are comprised of the following:
- Attachment 1 - Agenda
 - Attachment 2 - Summary of Discussion and Commitments/Agreements
 - Attachment 3 - Attendance List
 - Attachment 4 - Action Items



Attachment 1

325 HAZARDOUS WASTE TREATMENT UNITS
 Unit Managers Meeting
 337 Building, Mt. Rainier
 Richland, Washington

April 13, 1995
 2:00 p.m. to 4:00 p.m.

Agenda

1. Approval of Past Unit Managers Meeting Minutes (Ecology/RL/PNL)
2. 325 HWTUs Start-up Schedule (RL/PNL)
3. Status of 325 HWTUs NOI for Tank Storage (RL/PNL)
4. 325 HWTUs Part B Permit Application (Rev. 1) (Ecology/RL/PNL)
 - Status of Final Chapters (RL/PNL)
 - Ecology Informal Review and Comment (Ecology)
 - Comment Resolution Process (Ecology/RL/PNL)
5. TPA Procedural Closure Discussion (Ecology/RL/PNL)
 - 324 Sodium Removal Pilot Plant
 - 332 Storage Facility
6. Status of 300 Area RLWS Compliance Evaluation (RL/PNL)
7. Alternative Compliance Methods for the 325 HLRF Vault Tanks (RL/PNL)
8. Status Action Items (Ecology/RL/PNL)
 - New Action Items
 - Old Action Items

03-13-95:1 RL will provide Ms. Wallace a letter outlining the following: 1) WHC and Battelle noncompliance regarding the 300 Area rad liquid waste system (RLWS); 2) RL's proposal for splitting the RLWS system between WHC and Battelle.
 ACTION: C. Clark (RL)
 OPEN

03-13-95:2 Provide Ms. Wallace a package containing information pertaining to the original 1989 Part A withdrawal requests for the 332 Storage Facility and the 324 Sodium Removal Pilot Plant.
 ACTION: B. Day (PNL)
 OPEN
9. General Discussion (Ecology/RL/PNL)
10. Next Unit Managers Meeting (Ecology/RL/PNL)
 - Proposed during week of May 8
 - Proposed topics

Attachment 2

325 HAZARDOUS WASTE TREATMENT UNITS
Unit Managers Meeting
337 Building, Mr. Rainier
Richland, Washington

April 13, 1995
2:00 p.m. to 4:00 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Unit Managers Meeting Minutes

The March 13, 1995 Unit Manager Meeting minutes were approved.

2. 325 HWTU Start-up Schedule

Ms. K. Poston (PNL) stated that the operational readiness review will be submitted to the Readiness Assessment Board by the end of April 1995.

3. Status of 325 HWTU NOI for Tank Storage

Ms. Poston reported that revision of the 325 NOI has not been initiated.

4. 325 HWTU Part B Permit Application (Rev. 1)

● Status of Final Chapters

Mr. O. Olivares (PNL) stated that the final chapters of the 325 HWTU Part B permit application have been completed. Referring to Ecology's comments regarding the previously submitted chapters, Mr. Olivares indicated that the final chapters may require substantive changes before submittal to Ecology for review.

● Ecology Informal Review and Comment

A discussion was held among Ecology and RL/PNL regarding Ecology's comments on the 325 HWTU Part B permit application. Ms. J. Wallace (Ecology) noted her main concerns were that the 325 HWTU Part B permit application was written as a stand-alone document separate from the Hanford Facility Permit, and as a result a large portion of the information was redundant; and that the information contained in the HWTU Part B permit application was not always consistent with Hanford Facility Permit.

● Comment Resolution Process

Ecology and RL/PNL agreed to initiate the notice of deficiency (NOD) workshop meetings to address Ecology's comments. A NOD workshop was scheduled for April 18, 1995.

5. TPA Procedural Closure Discussion

- 324 Sodium Removal Pilot Plant

Mr. B. Day (PNL) provided Ms. Wallace a package containing documentation on the 332 Storage Facility and the 324 Sodium Removal Pilot Plant, and a 1989 RL/PNL letter requesting withdrawal of the Part A's for the two facilities. A meeting has been scheduled for May 3, 1995, to discuss procedural closure for the 332 Storage Facility, the 324 Sodium Removal Pilot Plant, and also for the Biological Treatment Test Facilities, the Thermal Treatment Test Facilities, and the Physical/Chemical Treatment Test Facilities.

- 332 Storage Facility

The status of the 332 Storage Facility was covered under TPA procedural closure for the 324 Sodium Removal Pilot Plant.

6. Status of 300 Area RLWS Compliance Evaluation

Mr. C. Clark (RL) stated that RL/WHC transmitted a letter on March 28, 1995, regarding the 340 building. Mr. H. Tilden (PNL) agreed to provide Ms. Wallace a copy of the letter. A meeting has been scheduled with Ecology and RL/WHC on May 5, 1995 to discuss to 300 Area rad liquid waste syste (RLWS) compliance. Ms. Wallace indicated that she would not be attending the meeting.

7. Alternative Compliance Methods for the 325 HLRF Vault Tanks

Mr. Tilden initiated a discussion regarding the daily inspection requirements for the 325 Storage Facility slab tanks, and he indicated that the assumption is that an alternative compliance mechanism for daily inspection will be devised. Mr. Tilden noted that PNL is planning activity data sheets (ADS) funding cycles, and the path forward for alternative compliance needs to be defined. Mr. Clark inquired about PNL's suggestions for an alternate compliance method. Mr. Tilden stated that the preferred alternative is to utilize the existing sump alarm system, which was tested as part of the visual inspection performed in March 1995, and the alarm system and the level indicators operated as designed.

Ms. Wallace inquired about other options. Mr. Tilden responded that any alternatives would involve using remote sensing or cameras, but there are areas that would be difficult to inspect remotely or with cameras. Mr. Clark added that several options have been discussed; however, there are no methods equivalent to a visual inspection which are cost efficient. Mr. Tilden noted that the outcome of the integrity test, according to WAC 173-303-640, will provide guidelines for establishing a schedule for reinspection. Ms. Wallace pointed out that the results of the integrity test would impact her decision whether a visual inspection would be required. Ms. Wallace expressed concern with

a non-visual approach, and stated that she would review the information RL/PNL had provided.

8. Status Action Items

- New Action Items

There were no new action items generated during the meeting.

- Old Action Items

Action item 03-13-95:1, RL will provide Ms. Wallace a letter outlining the following: 1) WHC and Battelle noncompliance regarding the 300 Area rad liquid waste system (RLWS); 2) RL's proposal for splitting the RLWS system between WHC and Battelle.

Ms. Wallace was provided the information, and this action item was closed.

Action item 03-13-95:2, Provide Ms. Wallace a package containing information pertaining to the original 1989 Part A withdrawal requests for the 332 Storage Facility and the 324 Sodium Removal Pilot Plant.

Ms. Wallace was provided the information, and this action item was closed.

9. Next Unit Managers Meeting

- The next Unit Managers Meeting was scheduled for May 31, 1995, from 2 to 4 p.m.

- Proposed Topics

Topics for discussion at the next Unit Managers Meeting will include a status of the NOD workshop meeting.

Attachment 4

325 HAZARDOUS WASTE TREATMENT UNITS
Unit Managers Meeting
337 Building, Mt. Rainier
Richland, Washington

April 13, 1995
2:00 p.m. to 4:00 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
01-10-95:1	RL will provide a status regarding the RLWS at the next Unit Managers Meeting. ACTION: C. Delannoy (RL) CLOSED
03-13-95:1	RL will provide Ecology (Ms. J. Wallace) a letter outlining the following: 1) WHC and Battelle noncompliance regarding the 300 Area rad liquid waste system (RLWS); 2) RL's proposal for splitting the RLWS system between WHC and Battelle. ACTION: B. Day (PNL) CLOSED
03-13-95:2	Provide Ms. Wallace a package containing information pertaining to the original 1989 Part A withdrawal requests for the 332 Storage Facility and the 324 Sodium Removal Pilot Plant. ACTION: B. Day (PNL) CLOSED

Distribution: -

M. A. Barnard	RL	L4-40
R. C. Bowman	WHC	H6-24
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNL	P7-79
D. L. Duncan	EPA Region 10	HW-106
G. D. Hendricks	GSSC	B1-42
K. A. Poston	PNL	P8-01
S. M. Price	WHC	H6-23
H. T. Tilden II	PNL	P7-68
P. J. Turner	PNL	P7-34
M. C. Vargas	RL	K8-50
J. J. Wallace	Ecology	B5-18
RCRA Files/GHL	WHC	H6-23

ADMINISTRATIVE RECORD: 325 Hazardous Waste Treatment Unit, T-3-4
 [Care of EDMC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files,
 P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail
 Stop HW-074 (Records Center)

Please send comments on distribution list to K. E. Knox (H6-23),
 (509) 372-3596